



October 21, 2019

The Honorable Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

SUBMITTED VIA EMAIL

RE: Proposed Fiscal Year 2019-20 Funding Plan for Clean Transportation Incentives for Low Carbon Transportation Investments and the Air Quality Improvement Program

Dear Chair Nichols and Commissioners:

Thank you for the opportunity to comment on the proposed Fiscal Year 2019-20 Funding Plan for Clean Transportation Incentives for Low Carbon Transportation Investments and the Air Quality Improvement Program (Funding Plan). The Western Propane Gas Association (WPGA) seeks to be a valuable contributor in both the development of the plan and the policies and procedures that may emerge as a result of these discussions.

WPGA would like to align ourselves with the comments submitted as apart of a large coalition of organizations working to clean California's air and meet greenhouse gas emission goals and would like to work with the California Air Resources Board (Board) to preserve funding for low-NOx vehicles in the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP). We appreciate the time and effort that both staff and the Board have spent on this issue and understand the difficulties the Board is experiencing with more projects to fund than the amount of incentive dollars allocated. However, WPGA would like to stress that heavy-duty low-NOx vehicles using renewable fuels are a substantial remedy to the problems of greenhouse gas emissions and NOx, especially in the near-term where heavy-duty zero emission vehicle solutions remain largely unavailable.

While each fuel source has its own advantages, many fleets across California and the nation choose propane to power their trucks. Propane provides fleet owners with a low emission, low cost, and high-energy fuel without compromising performance, range or engine life. We advocate supporting all low carbon solutions, based on the full fuel cycle carbon footprint to address environmental challenges. Propane provides reliability, affordability, stability and resiliency, all key when looking to transition California's transportation sector to cleaner fuels.

When looking toward the future, the propane industry is investing heavily in renewable propane, derived from sustainable sources like beef tallow or vegetable oil. The carbon intensity for renewable propane is on par with that of electric and the HVIP program can play an important role by sending a signal to the market of the importance of in-state production of renewable propane and the continued production of low-NOx engines to help reduce greenhouse gas emissions for decades to come.

The Western Propane Gas Association appreciates your work on the Funding Plan and HVIP and looks forward to working with you as the State strives to reduce greenhouse gas emissions through comprehensive clean energy solutions.

Sincerely,

Ben Granholm
Regulatory Affairs Specialist

cc: Commissioners, California Air Resources Board